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KEMP & KEMP

This request is made in good faith, is not made to cause delay, is submitted pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, and is the parties' fourth request. As demonstrated below, good cause exists for the parties' request:

- 1. The need for the extension arises from the sudden and unexpected disability of Plaintiff's attorney Victoria L. Neal, Esq. which began in August 2022. The parties have kept the Court informed of her progress and that she begun working a very reduced schedule and to the extent possible since November 2022. During that time, Ms. Neal responded to motions for summary judgment, filed and responded to several discovery motions, provided responses to discovery requests, and addressed administrative agency matters.
- 2. In addition to testing, treatment, and therapy, Ms. Neal had a medical procedure on November 21, 2022, and was out the entire week for recuperative purposes, as well as the holiday. The procedure was partially for treatment purposes, as well as serving as further diagnostic testing. In December 2022, it was determined that the November procedure was unsuccessful, and that spine surgery would be required.
- 3. The spine surgery occurred on February 8, 2023, with an expected recovery of 4-5 weeks. Ms. Neal anticipated returning between March 15, 2023, and March 20, 2023; however, Ms. Neal experienced, and continues to experience, post-operative complications impeding her ability to return to a full-duty schedule.
- 4. In consideration of the above, the parties submit that good cause exists to extend the deadline for Plaintiff to respond to Defendants' motion for summary judgment.

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